

Of Counsel
RUFO LAW GROUP, LLC

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Attorneys for Defendant
THE SOUTHDOWN INSTITUTE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

DAVID HUSTED, JR., an individual

Plaintiff,

vs.

ROMAN CATHOLIC CHURCH IN
THE STATE OF HAWAII, A.K.A.
THE ROMAN CATHOLIC DIOCESE
OF HONOLULU; THE DIOCESE OF
BUFFALO, N.Y.; SOUTHERN TIER
CATHOLIC SCHOOL ARCHBISHOP
WALSH ACADEMY; THE
SOUTHDOWN INSTITUTE; JAMES
A. SPIELMAN; and DOE
DEFENDANTS 1-10,

Defendants.

CIVIL NO. CV14-00192 SOM/BMK

DEFENDANT THE SOUTHDOWN
INSTITUTE'S **INITIAL**
DISCLOSURES PURSUANT TO
RULE 26 OF THE FEDERAL RULES
OF CIVIL PROCEDURE;
CERTIFICATE OF SERVICE

**DEFENDANT THE SOUTHDOWN INSTITUTE'S
INITIAL DISCLOSURES PURSUANT TO RULE 26 OF
THE FEDERAL RULES OF CIVIL PROCEDURE**

COMES NOW, Defendant THE SOUTHDOWN INSTITUTE

(hereinafter referred to as "Defendant"), by and through its attorneys, RUFO LAW GROUP, and, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure here, hereby submits the following Initial Disclosures:

I. KNOWLEDGEABLE INDIVIDUALS

Defendant preliminarily identifies the following individuals who are likely to have discoverable information that may be used to support its claims and defenses:

1. David Husted, Jr.
c/o Jared A. Washkowitz, Esq.
1050 Bishop Street, Suite 450
Honolulu, Hawaii 96813
2. Representatives/Employees/Agents of:
The Diocese of Buffalo, New York
c/o David Y. Suzuki, Esq.
119 Merchant Street, Suite 200
Honolulu, Hawaii 96813
3. Representatives/Employees/Agents of:
Roman Catholic Church in the State of Hawai'i, aka
The Roman Catholic Diocese of Honolulu
c/o Gary S. Miyamoto, Esq.
1003 Bishop Street, Suite 2500
Honolulu, Hawaii 96813

4. Representatives/Employees/Agents of:
Southern Tier Catholic School Archbishop Walsh Academy
c/o Stefan M. Reinke, Esq.
841 Bishop Street, Suite 1800
Honolulu, Hawaii 96813
5. Representatives/Employees/Agents of:
The Southdown Institute
c/o Sergio Rufo, Esq.
1050 Bishop Street, # 322
Honolulu, Hawaii 96813

Defendant reserves the right to name and call at trial additional witnesses identified during discovery, expert witnesses, rebuttal witnesses, all witnesses named by Plaintiff and other parties to this action, custodians of records and lay or expert witnesses who are qualified to testify as to the foundation and/or authenticity of documents to be entered into evidence, rebuttal witnesses, and other witnesses as necessary.

II. DOCUMENTS WHICH MAY BE USED AT TRIAL

Discovery has not commenced. Defendant has produced the only document it has regarding this case (an Exit Sheet) as Exhibit "A" to its Scheduling Conference Statement filed October 14, 2014. Defendant reserves its right to use any document produced by any party or obtained through discovery to support its claims and defenses. Defendant will supplement its disclosures as required by the Federal Rules of Civil Procedure.

III. COMPUTATION OF DAMAGES

Defendant is not claiming damages, except attorneys' fees and costs as allowed by law; and, therefore, has no computation of damages.

IV. INSURANCE AGREEMENT

Defendant is not presently aware of any insurance agreement applicable to this matter.

DATED: Honolulu, Hawai'i, November 21, 2014.

/s/ Sergio Rufo

SERGIO RUFO

RUFO LAW GROUP, LLC

Attorneys for Defendant

THE SOUTHDOWN INSTITUTE